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June 26, 2025

VIA ECF
Honorable Edgardo Ramos
U.S. District Court for the
Southern District of New York

RE: Dongguan Cheng One Co., Ltd. adv. Desen Inc.; Civil Action No.: 1:24-cv-03388-ER

Dear Honorable Judge Ramos,

I write on behalf of Plaintiff Dongguan Cheng One Co., Ltd. As Your Honor will recall, when we appeared on June 5th, 2025 to argue Defendant Desen's motion to vacate the default judgment, defense counsel Aleksander Milch requested time to attempt to settle the case, and that the Court hold in abeyance for one week its issuance of an order on the motion.

Plaintiff agreed, suggesting that the Defendant be given additional time, and on condition that Defendant provide sworn responses to the information subpoena within one week, i.e., by June 12th. Defendant agreed to that condition, advising that the responses would be provided within a week.

We have repeatedly written to Defendant's counsel both before and after the due date, and have been repeatedly promised responses to the information subpoena.

The time within which to respond has expired, nor has the Defendant even made a settlement offer despite Plaintiff's requests.

We were instructed to report back to the Court by June 26th, ergo we are reporting that our attempts to resolve this through settlement have failed, and that we therefore request that the Court issue its decision on Defendant Desen's motion to vacate the default judgment taken against it.

Respectfully submitted,
MAZZOLA LINDSTROM, LLP



Shan (Jessica) Chen
Counsel for Plaintiff